

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
Criminal No.

UNITED STATES OF AMERICA,

**INFORMATION**

Plaintiff,

18 U.S.C. § 641

v.

WADE KIRBY GILBERTSON,

Defendant.

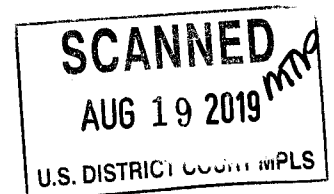
THE UNITED STATES ATTORNEY CHARGES THAT:

**BACKGROUND**

1. At all relevant times, the Social Security Administration has administered a number of federal benefit programs, including retirement insurance benefits. Monthly retirement insurance benefits are intended to replace earnings lost because of retirement for eligible retired workers. These benefits are based upon the retired worker's earnings prior to their retirement, and they cease to be paid upon the death of the beneficiary.

2. On or about December 25, 2005, retirement insurance beneficiary Hubert Gilbertson died, survived by several adult children, including Defendant, **WADE KIRBY GILBERTSON**. Unaware that Hubert Gilbertson had passed away, the Social Security Administration continued to deposit his monthly benefit payments into his bank account.

3. Beginning in and around January 2006 and continuing through in or around May 2018, Defendant, **WADE KIRBY GILBERTSON**, accessed his deceased father's



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bank account and used his deceased father's monthly benefits for Defendant's own expenses.

4. Continuously from in or around January 2006 and until in or around May 2018, Defendant knowingly spent approximately \$152,715 of Social Security benefits to which he knew he was not entitled.

**COUNT 1**  
(Theft of Government Funds)

5. The United States Attorney incorporates paragraphs 1 through 4 as if fully set forth herein.

6. Beginning in or around January 2006 and continuing through May 2008, in the State and District of Minnesota, Defendant,

**WADE KIRBY GILBERTSON,**

did knowingly and willfully embezzle, steal, purloin, and convert to his use money of the Social Security Administration ("SSA"), a department and agency of the United States; to wit: SSI benefits having a value greater than \$1000.00, all in violation of Title 18, United States Code, Section 641.

**FORFEITURE ALLEGATIONS**

Count 1 of this Information is hereby realleged and incorporated as if fully set forth herein by reference, for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

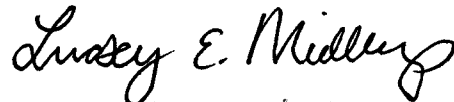
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As a result of the offense alleged in Count 1 of this Information, Defendant shall forfeit to the United States any property, real or personal, which constitutes or is derived from proceeds traceable to the violation of Title 18, United States Code, Section 641.

If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided for in Title 21, United States Code, Section 853(p) as incorporated by Title 28, United States Code, Section 2461(c).

Dated: August 19, 2019

ERICA H. MacDONALD  
United States Attorney

A handwritten signature in cursive script, reading "Lindsey E. Middlecamp".

BY: LINDSEY E. MIDDLECAMP  
Special Assistant U.S. Attorney  
Attorney ID No. 392589